

**United States District Court  
District of Massachusetts**

<b>Paul W McCree, Jr.,</b>	)	
	)	
<b>Plaintiff</b>	)	<b>Civil Action NO. 04-11334JLT</b>
	)	
<b>v.</b>	)	
	)	
<b>Pension Benefit Guaranty</b>	)	
<b>Corporation,</b>	)	
	)	
<b>Defendant</b>	)	

**Motion of Paul W. McCree, Jr.  
for  
Supplemental Pleading**

I, Paul W. McCree, Jr., by Rule 15 (d) of the Federal Rules of Civil Procedure move for Supplemental Pleading to support the Plaintiff's Motion for Summary Judgement. The pleading provides justification and corroboration of the validity of pay roll check stubs as a reliable and authentic source of employment and salary history. This Pleading is submitted in response to questions arising about the issue at the scheduled Conference on 11/02/04 with his Honor, Judge Tauro presiding. The basis for the pleading is attached.

Respectfully submitted:



Paul W. McCree, Jr.

Dated: 11/03/2004

cc: Sherease Pratt Louis  
Staff Attorney  
Office of the General Counsel  
Pension Benefit Guaranty Corporation